Kathleen Grillo
Vice President
Federal Regulatory

1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2533
Fax 202 336-7922
kathleen.m.grillo@verizon.com

July 12, 2005

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **In the Matter of IP-enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196**

Dear Ms. Dortch:

On July 11, 2005, Kathleen Grillo, Maureen Napolitano, Michael O'Connor, Leslie Owsley, and Doug Sullivan of Verizon met with Julie Veach, Christi Shewman, Nick Alexander, Carol Simpson, and Tim Stelizig of the Wireline Competition Bureau regarding the above-referenced proceedings. The attached presentation formed the basis of the discussions.

Pursuant to Section 1.1206(b) of the Commission's rules, one electronic copy of this notice is being filed in the above-referenced proceeding.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Kathleen Grillo

Attachment

cc: Julie Veach
Christi Shewman
Nick Alexander
Carol Simpson
Tim Stelizig

Verizon Wholesale VoIP E911
New York City

- New York City E911 solution “Live” on 7/7
- Cooperative planning, deployment, and testing
- Direct access trunks installed 38 days after order was placed
- VoIP providers able to offer E911 in NYC

Verizon Wholesale VoIP E911
Verizon Footprint

- Verizon has approximately 150 selective routers serving approximately 2000 PSAPs
- Direct access trunking has been ordered into the NYC selective routers serving the NYC PSAP
- Intrado has established and Vonage is establishing wholesale ordering capabilities with Verizon

Verizon Wholesale VoIP E911
Intrado

- Began working with Verizon account manager in April 2005
- Completed one-time wholesale registration process May 2005
- Ordered trunks for NYC June 2005
- Trunks delivered July 2005
- Verizon fully prepared for additional trunk orders in its footprint

Verizon Wholesale VoIP E911
Vonage

- Began working with Verizon account manager in April 2005
- Verizon awaiting Vonage completion of one-time wholesale registration process
- On June 9, 2005, Verizon provided tariff references for Verizon East as requested by Vonage
- Verizon ready for trunk orders in its footprint

Verizon Wholesale VoIP E911
PSTN Solutions

- PSTN solution is inferior and untested by Verizon
- PSTN Solution is a 10-digit number assigned to each selective router allowing 911 calls to be delivered over the PSTN, not dedicated trunks, as in NYC.
  - Issues:
    - 911 calls are not prioritized over other types of calls. VoIP 911 calls may not reach PSAPs during high volume calling periods (i.e., disasters, terrorist attacks, Mothers Day).
    - PSTN solutions are not in the NENA migratory path to an end state IP E911 architecture.
    - Potential security vulnerabilities (e.g., denial of service attacks) could overwhelm PSAP operations.

Verizon Retail VoIP
VoiceWing Notification

- VoiceWing service activation has always included affirmative acknowledgement by customers of limitations of emergency response service. (Verizon maintains a record of the customer's response.)
- Verizon is supplementing that notification through e-mail, phone calls, and direct mail to existing customers
- Separate direct mailing will include VoiceWing warning labels.
- New VoiceWing customers will get the enhanced notification and warning labels during service activation.

Verizon Retail VoIP
VoiceWing (Mass Market)

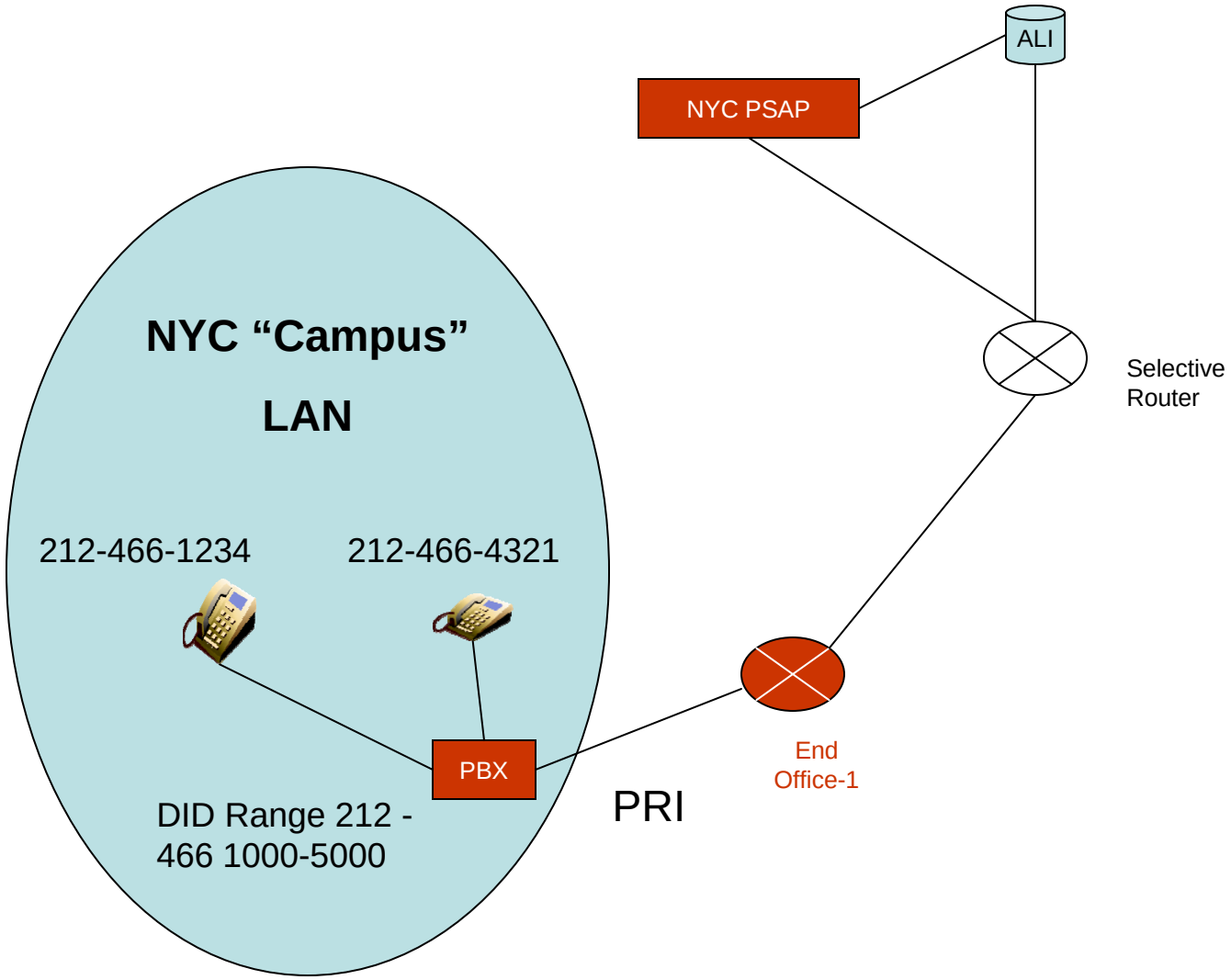
- Verizon's VoiceWing offers nomadic capability and non-native telephone numbers
- VoiceWing does not have the scale and scope needed to purchase direct access trunking throughout the U.S.
- VoiceWing will be dependent on 3rd party VoIP E911 vendors with the necessary scale and scope to enable VoiceWing compliance

Verizon Retail VoIP

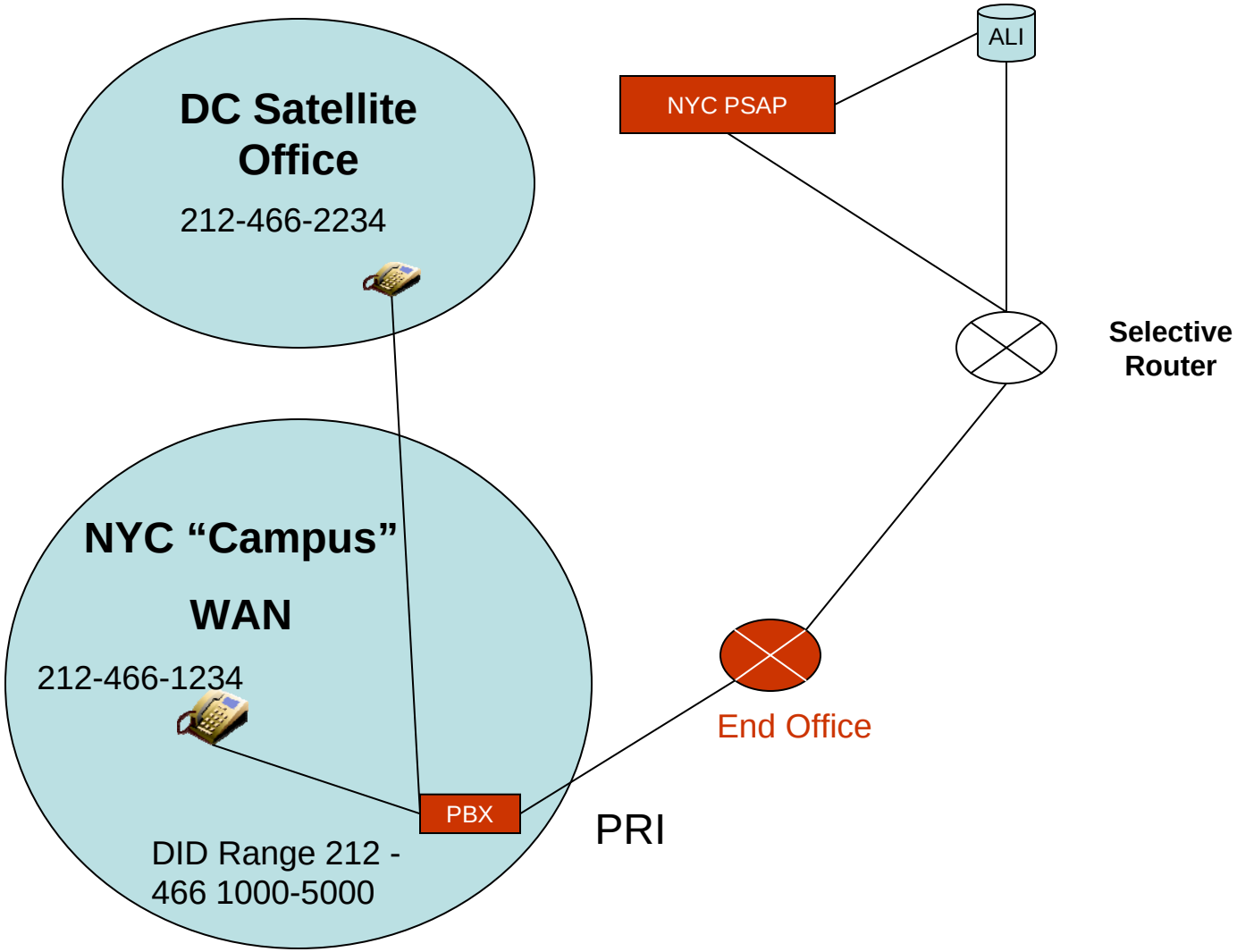
Business VoIP Market

- Verizon plans to offer VoIP services to the business market in 2005
- One service will enable nomadic use of VoIP
- Another service connects IP PBXs
- PBX end users can program their PBX's wide area network capabilities to enable nomadic use (true for both TDM-based voice and IP-based voice)
- Current IP PBX technologies preclude nomadic E911 solutions

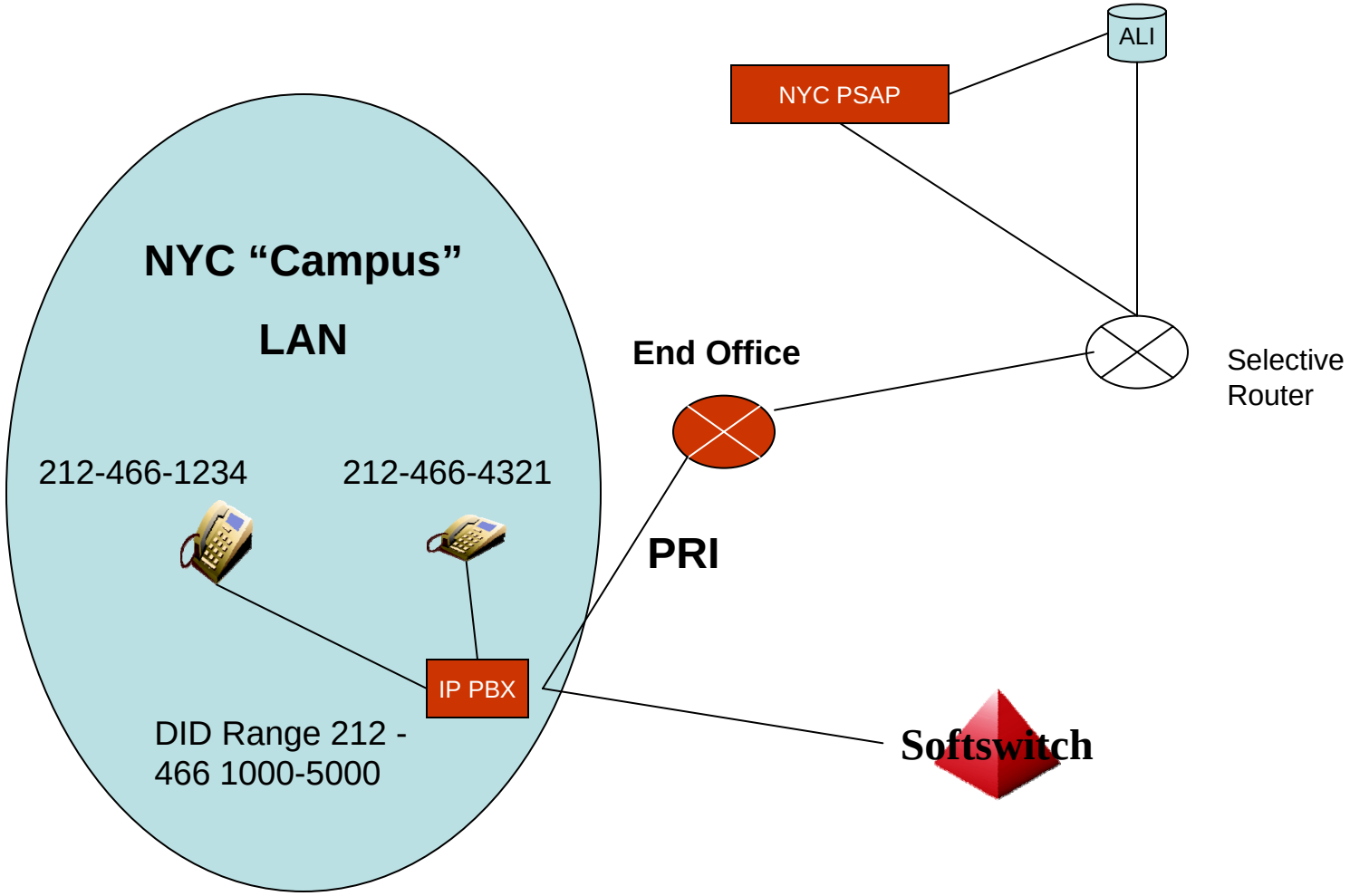
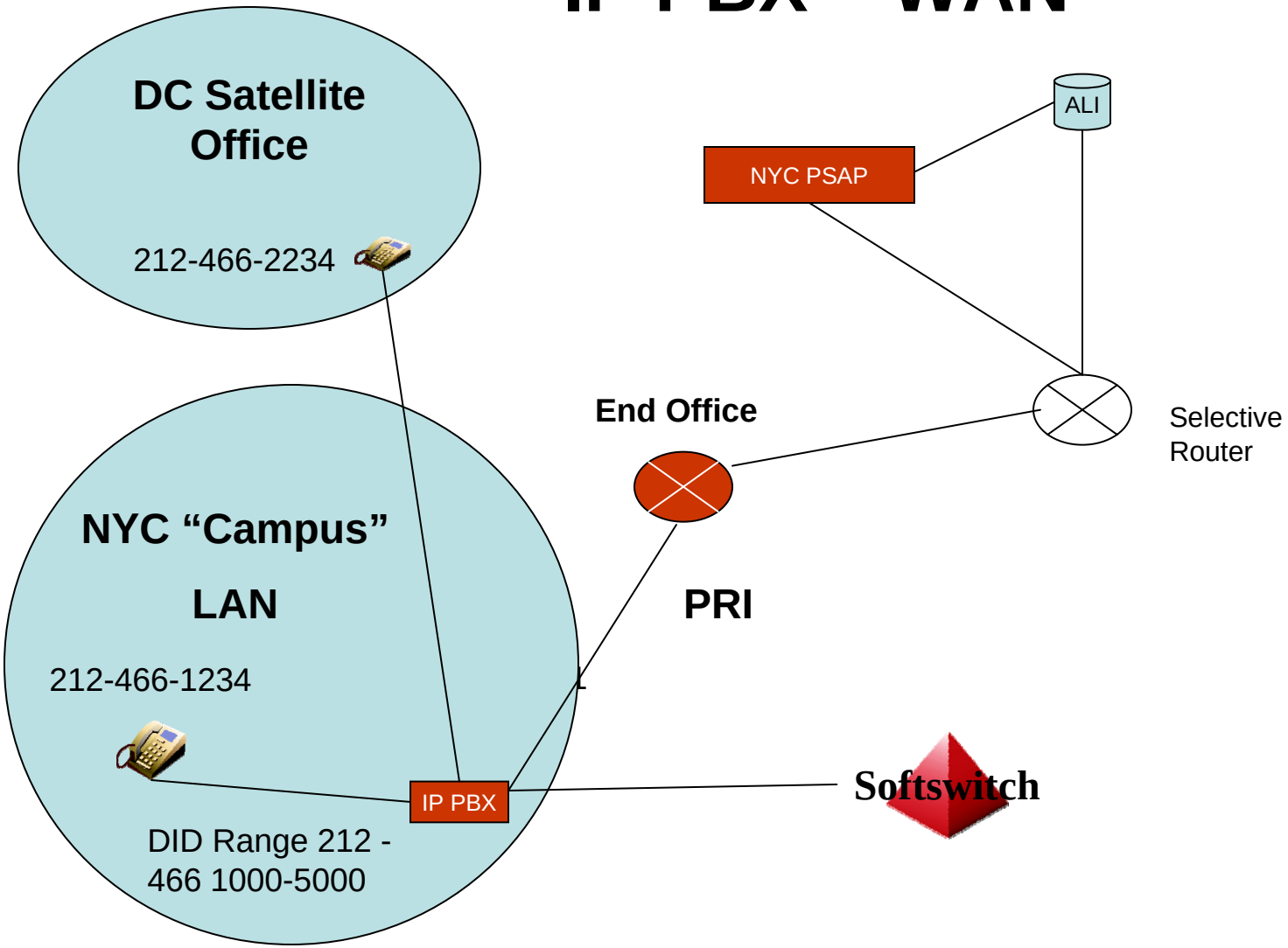
E911 Routing
TDM PBX - LAN



E911 Routing
TDM PBX – WAN



E911 Routing
IP PBX – LAN



E911 Routing
IP PBX – WAN